

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION

In re: :  
: CHAPTER 13  
: CASE NO.: 5:24-bk-00718-MJC  
Neekimu Jardim, :  
Debtor. :  
\_\_\_\_\_: :  
: SELECT PORTFOLIO SERVICING, INC., :  
Movant, :  
v. :  
: Neekimu Jardim, :  
Debtor/Respondent, :  
: Jack N. Zaharopoulos, :  
Trustee/Additional Respondent. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF OF  
SELECT PORTFOLIO SERVICING, INC.**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. After reasonable investigation, Debtor is unable to verify the veracity of this allegation, and therefore it is denied.
8. Denied. Debtor's Fifth Amended Plan (Doc. 58) was confirmed on March 20, 2025.
9. Denied. This paragraph represents a legal conclusion to which no response is required.
10. Denied. Debtor does not have access to Movant's internal records.

11. Denied. After reasonable investigation, Debtor is unable to verify the veracity of this allegation, and therefore it is denied.

12. Denied. After reasonable investigation, Debtor is unable to verify the veracity of this allegation, and therefore it is denied.

13. Admitted.

14. Denied. This paragraph represents a legal conclusion to which no response is required.

15. Denied. This paragraph represents a legal conclusion to which no response is required.

16. Denied. This paragraph represents a legal conclusion to which no response is required.

17. Denied. This paragraph represents a legal conclusion to which no response is required.

WHEREFORE, Debtor, Neekimu Jardim, respectfully requests the Motion for Relief be denied.

**NEWMAN WILLIAMS, P.C.**

*By:/s/ Robert J. Kidwell*  
Robert J. Kidwell, Esquire  
Attorney for Debtor

Date: April 1, 2025